

REMARKS

2 Applicant respectfully requests allowance of the subject application.
 3 Claims 1-26 are pending. Claims 1, 8, 17, 20 and 22 are amended. In view of the
 4 following remarks, Applicant respectfully requests that the rejections be
 5 withdrawn and the application be forwarded along to issuance

§ 103(a) Rejections

8 Claims 1-7 and 14-24 stand rejected under 35 U.S.C. § 103(a) as being
 9 unpatentable over U.S. Published Patent Application No. 2002/0059623 to
 10 Rodriguez et al. (hereinafter “Rodriguez”). Claim 8-10, 12-13 and 26 are rejected
 11 as being unpatentable over Rodriguez in view of U.S. Patent No. 6,018,372 to
 12 Ethredge (hereinafter “Ethredge”). The Applicant respectfully disagrees.

13 Claim 1 has been amended, and as amended (portions of the amendment
 14 appear in bold/italics below), recites a method including:

- 15 • storing program data for an electronic program guide in multiple tables,
 16 each table comprising one or more records with one or more fields ***and***
 17 ***at least two said tables are related such that one said record in one***
 18 ***said table indexes another said record in another said table;*** and
- 19 • sorting the records in the tables according to a selected field type prior
 20 to delivery of the program data to a remote client.

21 Support for the amendment may be found throughout the specification and
 22 drawings as filed, an example of which may be found at page 11 of the subject
 23 application. Neither Rodriguez nor Ethredge teach or suggest or suggest these
 24 features, namely indexes between tables. Accordingly, claim 1 as amended is
 25 allowable and withdrawal of the rejection is respectfully requested.

1 **Claims 2-7** depend either directly or indirectly from claim 1 and are
2 allowable as depending from an allowable base claim. These claims are also
3 allowable for their own recited features which, in combination with those recited
4 in claim 1, are neither shown nor suggested in the references of record, either
5 singly or in combination with one another.

6 **Claim 8** has been amended, and as amended (portions of the amendment
7 appear in bold/italics below), recites a method for delivering program data for an
8 electronic program guide executing at a remote client, the method including:

- 9 • storing program data for an electronic program guide in multiple tables,
10 the tables comprising one or more program tables with records of
11 programming information, the program tables having a title field for
12 program titles, ***and one said record in one said table indexes another***
13 ***said record in another said table;***
- 14 • sorting the records in the program tables according to the title field; and
- 15 • constructing a data file to hold the tables.

16 Support for the amendment may be found throughout the specification and
17 drawings as filed, an example of which may be found at page 11 of the subject
18 application. Neither Rodriguez nor Ethredge teach or suggest or suggest these
19 features, namely indexes between tables. Accordingly, claim 8 as amended is
20 allowable and withdrawal of the rejection is respectfully requested.

21 **Claims 9-13** depend either directly or indirectly from claim 8 and are
22 allowable as depending from an allowable base claim. These claims are also
23 allowable for their own recited features which, in combination with those recited
24 in claim 8, are neither shown nor suggested in the references of record, either
25 singly or in combination with one another.

1 **Claim 14 recites a computer-readable medium comprising computer-**
2 **executable instructions that, when executed, direct a computing system to:**

- 3 • sort program data for an electronic program guide according to stopped
4 names of program titles; and
5 • store the program data in a data structure for delivery to a remote client.

6 These features are not disclosed, taught or suggested by the references of record,
7 alone or in combination.

8 The Office, in rejecting this claim correctly states that "Rodriguez fails to
9 teach the sorting of the name in the title field as a form of a stopped name version
10 of the program name in the title field". *Office Action Dated March 11, 2005, Page*

11 5. However, the Office then incorrectly asserts the following:

12 The stopped name version of the program name in the title
13 field can be interpreted as the name in the title field (page 13,
14 paragraph [0091]). At the time the invention was made, it
15 would have been obvious to one of ordinary skill in the art to
16 sort the program records according to the name in the title
17 field in order to coalesce program data sets into one, and
18 organize into a format suitable for reception and
19 interpretation by the EPG application running on the digital
20 home communication terminal. *Office Action Dated March*
21 11, 2005, Page 5.

22 This is not the case. The portion of Rodriguez asserted by the Office is excerpted
23 as follows for the sake of convenience:

24 [0091] EPG data typically spans program information for the
25 complete channel line-up, be it hundreds or possibly
26 thousands of channels, for a pre-specified time-window (e.g.,
27 14 or 30 days). An individual service (e.g., NBC, HBO,
28 Video-On-Demand, Email) is typically associated with each
29 channel. Since the duration of programs vary and is typically
30 from 30 minutes to 150 minutes, a channel could possibly
31 offer 48 programs per day. If program durations are as short

1 as five minutes, this could result in over 100 programs per
2 day. Considering the number of programs per day for each
3 channel, the number of channels, and the number of days of
4 program information, the EPG data can demand an amount of
5 memory that surpasses the typical memory limits of a low-
6 cost, high-volume subscriber device. Alternatively, depending
7 on the processor capabilities of the DHCT 14, it may be more
8 efficient to perform sorting operations on the EPG data at the
headend 26. In such embodiments the EPG Server 220 (FIG.
3A) or BFS server 228 includes EPG data for multiple sorts
such as program theme or title, all of which can be
simultaneously accessed and downloaded into a DHCT 14. In
such a configuration, the memory requirements for the EPG
database are much greater. *Rodriguez, Paragraph 91.*

9 Although the above referenced portion mentions EPG data for a title, the asserted
10 portion makes no mention whatsoever of a "stopped names of program titles" as
11 recited in claim 14.

12 Beginning at page 12 of the subject application, an exemplary use of
13 stopped names is discussed. For example, in one implementation, the data sorter
14 222 arranges EPG data in the program tables alphabetically according to the
15 "stopped name" of the program. The "stopped name" of a program is the
16 shortened version of the program title that contains the identifying words, without
17 common joiner words such as "the", "and", etc. For example, the movie "The
18 Good, The Bad, and The Ugly" might have a stopped name of "Good, Bad, Ugly"
19 and the program "How the West was Won" might have a stopped name of "West
20 Won".

21 Rodriguez does not teach or suggest anything beyond the mention of a title,
22 which is contrary to the Office's assertion of a relationship between names and
23 titles. It should also be noted that this asserted relationship by the Office does not
24 appear in Rodriguez. Further, contrary to the Office's assertion, Rodriguez does
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1 not include motivation as to why such a sorting arrangement would be desirable,
2 e.g., Rodriguez does not teach or suggest that the title is insufficient.

3 It is respectfully submitted that absent the present Application, Rodriguez
4 does not teach or suggest the above recited features, including "stopped names of
5 program titles". Accordingly, a *prima facie* case of obviousness has not been
6 established, and withdrawal of the rejection with respect to claim 14 is respectfully
7 requested.

8 **Claim 15** depends directly from claim 14 and is allowable as depending
9 from an allowable base claim. This claim is also allowable for its own recited
10 features which, in combination with those recited in claim 14, are neither shown
11 nor suggested in the references of record, either singly or in combination with one
12 another.

13 **Claim 16** recites a data structure stored on a computer-readable medium
14 including:

- 15 • multiple tables to store program data for use in an electronic program
16 guide;
- 17 • the tables comprising program tables composed of records with
18 programming information, the program tables having a title field to hold
19 program titles; and
- 20 • the records of the program tables being sorted by stopped name versions
21 of the program titles.

22 These features are not disclosed, taught or suggested by the references of record,
23 alone or in combination.

24 The Office, in rejecting this claim, again asserts Rodriguez at paragraph
25 [0091] for support of "stopped name version of the program titles". As previously

1 described in relation to claim 14, however, although Rodriguez mentions EPG
2 data for a title, Rodriguez does not teach or suggest anything more beyond the
3 mention of a title, contrary to the Office's assertion of a relationship between
4 names and titles. It is respectfully submitted that absent the present Application,
5 Rodriguez does not teach or suggest the above recited features, including "stopped
6 name versions of program titles" as recited in claim 16. Accordingly, a *prima*
7 *facie* case of obviousness has not been established, and withdrawal of the rejection
8 with respect to claim 16 is respectfully requested.

9 **Claim 17 has been amended, and as amended (portions of the amendment**
10 **appear in bold/italics below), recites a computer system including:**

- 11 • a memory;
12 • a processor coupled to the memory; and
13 • a data sorter program stored in memory and executed on the processor
14 to sort electronic program guide (EPG) data according to a data type
15 *into records arranged in multiple tables, at least two said tables are*
16 *related such that one said record in one said table indexes another*
17 *said record in another said table,* prior to delivery of the EPG data to a
18 remote client.

19 Support for the amendment may be found throughout the specification and
20 drawings as filed, an example of which may be found at page 11 of the subject
21 application. Neither Rodriguez nor Ethredge teach or suggest or suggest these
22 features, namely indexes between tables. Accordingly, claim 17 as amended is
23 allowable and withdrawal of the rejection is respectfully requested.

24 **Claims 18-19 depend either directly or indirectly from claim 17 and are**
25 allowable as depending from an allowable base claim. These claims are also

allowable for their own recited features which, in combination with those recited in claim 17, are neither shown nor suggested in the references of record, either singly or in combination with one another.

Claim 20 has been amended, and as amended (portions of the amendment appear in bold/italics below), recites a processing system including:

- sorting means for sorting program data for an electronic program guide according to a data type that a viewer is likely to search, *wherein the program data is sorted into multiple tables, at least one said table includes a record that indexes a record in another said table*; and
- transmission means for transmitting the sorted program data to the client.

Support for the amendment may be found throughout the specification and drawings as filed, an example of which may be found at page 11 of the subject application. Neither Rodriguez nor Ethredge teach or suggest or suggest these features, namely indexes between tables. Accordingly, claim 20 as amended is allowable and withdrawal of the rejection is respectfully requested.

Claim 21 depends either directly or indirectly from claim 20 and is allowable as depending from an allowable base claim. This claim is also allowable for its own recited features which, in combination with those recited in claim 20, are neither shown nor suggested in the references of record, either singly or in combination with one another.

Claim 22 has been amended, and as amended (portions of the amendment appear in bold/italics below), recites a television entertainment system including:

- 1 • multiple clients to receive television signals and corresponding program
- 2 data for an electronic program guide (EPG), individual clients having a
- 3 search engine to search the program data; and
- 4 • an EPG server to sort the program data prior to delivery to the client, the
- 5 program data being sorted according to a selected parameter to place the
- 6 program data in a sorted arrangement to facilitate searching at the client,
- 7 *wherein the sorted arrangement includes a record for the selected*
- 8 *parameter that indexes another record for another parameter.*

9 Support for the amendment may be found throughout the specification and
10 drawings as filed, an example of which may be found at page 11 of the subject
11 application. Neither Rodriguez nor Ethredge teach or suggest or suggest these
12 features, namely indexes between tables. Accordingly, claim 22 as amended is
13 allowable and withdrawal of the rejection is respectfully requested.

14 **Claims 23-26** depend either directly or indirectly from claim 22 and are
15 allowable as depending from an allowable base claim. These claims are also
16 allowable for their own recited features which, in combination with those recited
17 in claim 22, are neither shown nor suggested in the references of record, either
18 singly or in combination with one another.

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Conclusion

All of the claims are in condition for allowance. Accordingly, Applicant requests a Notice of Allowability be issued forthwith. If the Office's next anticipated action is to be anything other than issuance of a Notice of Allowability, Applicant respectfully requests a telephone call for the purpose of scheduling an interview.

Respectfully Submitted,

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By:

W. J. Breen III
William J. Breen III
Reg. No. 45,313
(509) 324-9256 x249